

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**JAMES LAEL JENSEN
MAXWELL STERLING JENSEN
a/k/a “Max”
KELLY ANNE JENSEN
ZACHARY GOLDEN JENSEN**

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Case No. 1:25:cr-257

**DEFENDANT MAXWELL STERLING JENSEN’S MOTION FOR EARLY
PRODUCTION OF GIGLIO MATERIAL**

TO THE HONORABLE COURT:

Defendant Maxwell Sterling Jensen, through his counsel, Robert L. Guerra, Jr., respectfully requests this honorable court, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the Fifth and Sixth Amendments to the United States Constitution and the inherent powers of this court to order and regulate discovery in order to secure for the defendant a fair trial, to order the Government to provide all impeachment material, as judicially construed in *Giglio v. U.S.*, 405 U.S. 150, 92 S. Ct. 763, 31 L. Ed. 2d 104 (1972), and as requested in defendant’s motion for exculpatory evidence, submitted herewith, well in advance of the commencement of trial. As grounds therefore, Defendant asserts that such disclosures are necessary in order to permit defendant the opportunity to adequately and fully prepare their defense.

Certificate of Conference

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Maxwell Sterling Jensen attempted to confer with Assistant United States Attorney Laura Garcia, as to her position in this Motion and as of the time of this filing was unable to confer.

Prayer

Defendant, therefore, respectfully requests that the Court grant this Motion. If the Court deems it necessary, Defendant requests the Court set a hearing to consider further evidence and arguments in this matter.

Respectfully submitted,

LAW OFFICE OF ROBERT GUERRA, PLLC

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MAXWELL STERLING JENSEN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via e-mail on this 15th day of May 2025 to the following:

| | | |
|---|-------------------------------------|---------------------|
| Ms. Laura Garcia Assistant United States Attorney United States Attorney's Office 600 E. Harrison, Rm 201 Brownsville, Texas 78520 Ph: (956) 548-2554 Email: laura.garcia@usdoj.gov | <input type="checkbox"/> | Regular Mail |
| | <input type="checkbox"/> | Certified Mail, RRR |
| | <input type="checkbox"/> | Hand Delivery |
| | <input type="checkbox"/> | Facsimile |
| | <input checked="" type="checkbox"/> | Electronic Mail |

/s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.